

# EXHIBIT A

1                   IN THE UNITED STATES DISTRICT COURT  
                  FOR THE DISTRICT OF NEW JERSEY  
2                   CAMDEN VICINAGE

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4 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875  
AND IRBESARTAN PRODUCTS

5      LIABILITY LITIGATION      Civil No.  
19-2875.

6 \*\*\*\*\* (RBK/JS)

THIS DOCUMENT APPLIES TO ALL  
7 CASES

HON ROBERT B.  
KUGLER

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9 - CONFIDENTIAL INFORMATION -  
SUBJECT TO PROTECTIVE ORDER

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11 VIDEOTAPED DEPOSITION OF JUCAI GE  
12 APRIL 30, 2021  
VOLUME IV

13

Continuation of the Remote Videotaped via  
Zoom Deposition of JUCAI GE, commencing at 7:23 a.m.  
China Standard Time, on the 30th of April, 2021,  
before Juliana F. Zajicek, Registered Professional  
Reporter, Certified Shorthand Reporter and Certified  
Realtime Reporter.

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23 GOLKOW LITIGATION SERVICES  
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deps@golkow.com

24

1 the -- or your -- can you describe your understanding  
2 of Mr. Chen's role as it relates to the day-to-day  
3 aspects of AP -- of -- of API and finished dose  
4 manufacturing?

5 A. Mr. Chen has been either the general  
6 manager or the chairman of the board since I joined  
7 the company. That position is the highest position in  
8 the companies. You know, our ZHP has many companies  
9 or subsidiaries. My understanding of Mr. Chen's role  
10 is to formulate strategies and manage vice presidents.  
11 I don't think he is involved in the day-to-day  
12 activities of the API of finished dose product  
13 manufacturing. Simply put, I don't think he has any  
14 time for that.

15 Q. Over the past few days plaintiffs' counsel  
16 has asked you about a number of different kinds of  
17 documents relating to quality, such as SOPs, the  
18 quality management system, the quality management  
19 procedures, change control processes, deviation report  
20 processes. I'd like to ask you about Mr. Chen's  
21 involvement in those activities.

22 Ms. Ge, how, if -- how, if at all, has  
23 Mr. Chen participated in the development and drafting  
24 of SOPs pertaining to the manufacture of valsartan?

1                   You -- you are -- as the director of  
2   quality assurance, you are familiar with the root  
3   cause analysis regarding the nitrosamine impurities in  
4   valsartan?

5           MS. HILTON:   Objection; leading, form.

6   BY THE WITNESS:

7           A.     I organized the investigation on the  
8   nitrosamine impurities in valsartan.   I'm quite  
9   familiar.

10   BY MR. GOLDBERG:

11          Q.     Are you aware of any independent analysis  
12   that Mr. Chen contributed to the root cause  
13   investigation of the nitrosamine impurities in  
14   valsartan?

15          MS. HILTON:   Objection; vague.

16   BY THE WITNESS:

17          A.     I don't understand what you mean by "any  
18   independent analysis," but I still want to try to  
19   respond to your question based on my understanding of  
20   your question.

21                   As for the NDMA impurities in the  
22   valsartan API, it was the QA department at Chuannan  
23   facility that organized the corresponding departments  
24   and conducted an investigation.

1                   For the NDMA impurity investigation,  
2   Mr. Chen never got involved in the root cause  
3   analysis, root cause investigation or creation of the  
4   deviation report. He never got involved. All he  
5   knows is from the reports we provided to him.

6           MR. GOLDBERG: Thank you. I have no further  
7   questions.

8           MS. HILTON: I have some follow-up questions.

9                                   FURTHER EXAMINATION

10   BY MS. HILTON:

11           Q.    Ms. Ge, you just testified that all of the  
12   chairman of the company, Baozhen Chen, knows is from  
13   the reports we provided to him.

14                   How do you begin to purport to know what  
15   knowledge Mr. Chen has about NDMA?

16           A.    He organized a meeting or meetings on the  
17   topic of NDMA in valsartan. He did organize such a  
18   meeting or meetings.

19           Q.    So --

20           A.    During the meeting we all reported or all  
21   of the departments reported to him regarding the  
22   progress of the investigation and -- and -- and other  
23   information.

24           Q.    During the meetings, what did Mr. Chen say